

I currently hold an Amateur Extra Class License and have been licensed as a Radio Amateur for nearly 30 years. I fully encourage the FCC to quickly eliminate all Morse code testing requirements for Amateur Radio License Applicants. The Morse code test no longer has relevance and is actually in opposition to the purposes of an Amateur Radio Service in the 21st Century. The FCC so much as already said so in its report and order reorganizing the Amateur Radio Service in 2000.

History

The Morse proficiency requirement was imposed by Navy in 1912 so that amateur operators would be able to understand the military's instructions in an emergency. Today's military no longer uses Morse, thus making the reason irrelevant. In fact, in order to make sure we can hear their instructions and be compatible with them, they actually prohibit Amateurs from using Morse on the new 60-meter band!

Barrier to Entry

I teach Radio Merit Badge to Boy Scouts. While a few of our prospective customers enjoy the idea of Morse, most are deterred by it as an archaic barrier to entry. Since a goal of the amateur service is to develop a pool of persons skilled for an emergency, why should we limit the size of that pool by using an obsolete technology as a barrier? Thus the Morse requirement is currently at odds with one of the premier purposes of the amateur service.

It's now just one mode of many.

We don't require applicants to demonstrate proficiency in any other mode such as Phone, SSTV, RTTY, and PSK31. Why do we need to do so for this one? If its virtues are so apparent, folks will learn it of their own free will if they want to use it. They do so for all of the other modes.

It doesn't necessarily make good operators.

Most hams (probably 75%, as 50% of current licensees are no-code Technician Class licensees) never use Morse. I know of one ham who has been licensed for nearly 30 years, is an Extra Class Licensee, holds Worked All Continents, Worked All US States, received 3 Public Service Awards, serves as a Section Emergency Coordinator and Public Information Officer, and actively promotes Amateur Radio to Scouts and others. He has never made a single on the air Morse contact. Ever. That ham is myself

No one else uses it.

Tune across the non-amateur HF spectrum from 3 to 30 MHz. Note how many Morse signals you hear versus other modes. You'll find a miniscule fraction. Even the USCG doesn't monitor Morse any more. So its use for emergency purposes is negligible.

It's an obsolete and irrelevant historical relic.

We don't require people to demonstrate how to saddle a horse before they get a motor vehicle driver's license and we don't require hams to buy radios with tubes instead of transistors. Likewise, the requirement for Morse proficiency is one whose time has past.

The ITU and the International Amateur Radio Union have agreed. The FCC needs to follow in order to allow the Amateur Service to reach its stated goals.

Mandatory Morse testing is at odds with each of those goals:

- (a) Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications.

It is easy to see that 90 percent of all Amateur Emergency Communications is VHF-FM, with the remaining 10% being HF SSB, mostly offshore.

- (b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.

Advancement in the radio art today is mostly in the digital modes, not CW. Testing of knowledge of the seven-layer OSI model probably makes more sense today.

- (c) Encouragement and improvement of the amateur service through rules, which provide for advancing skills in both the communications and technical phases of the art.

The Morse Requirement is contradictory to this

- (d) Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.

The Morse testing requirement is directly in opposition to this. Many prospective Amateurs pass on the hobby due to what they rightfully perceive as an obsolete barrier to entry.

- (e) Continuation and extension of the amateur's unique ability to enhance international goodwill.

Most foreign amateurs use both CW and SSB.

Thank you for your time. I look forward to a speedy removal of the Morse code testing requirement to better achieve the purposes set forth for the Amateur Service by the FCC.

Sincerely,

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